

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**ASSENTED-TO MOTION FOR ORDER COMPELLING PRODUCTION OF STATE  
PROBATION DOCUMENTS AND TESTIMONY REGARDING GPS DATA**

Now comes the United States, by its attorneys, Nathaniel R. Mendell, Acting United States Attorney, and Michael J. Crowley and Sarah B. Hoefle, Assistant U.S. Attorneys, with the assent of counsel for the defendant Ricky PINA, a/k/a “Blake,” and requests that the Court order the Massachusetts Probation Service to produce state probation records and to provide a witness to testify at trial, or any other proceeding before the Court, in the matter of United States v. Ricky Pina, No. 18-10197-LTS-8. The materials are requested to be produced on or before January 10, 2022 and relate to the Massachusetts Probation Service’s Global Positioning System (“GPS”) records of PINA on or about September 5, 2017, which is the date of a murder on Stoughton Street in Boston, Massachusetts (the “September 5, 2017 murder”) with which PINA is alleged to have been specifically involved and which is alleged to have been committed by the Norton/Olney/Barry criminal organization and street gang (“NOB”). See, e.g., Complaint (ECF Dkt. No. 1) ¶ 20.

As reasons therefore, the government states that the GPS records are relevant to PINA's whereabouts at or about the time of the September 5, 2017 murder, at which time PINA was on state court-ordered GPS monitoring. The GPS records are expected to show that, on September

5, 2017, before the time of the murder, PINA was around the area of the murder site multiple times, consistent with conducting reconnaissance for the murder, and was additionally at or around other locations associated with NOB members and/or associates. This evidence is relevant to the pending charges in this case, including the pending RICO conspiracy charge involving NOB, pursuant to 18 U.S.C. § 1962(d). In order to produce records and later for the witness to testify concerning state probation matters, the witness requires a court order compelling them to do so.

Wherefore, the government, with the assent for counsel for the defendant PINA, moves to compel the production of the probation records and subsequent testimony.

A copy of a proposed Order is attached hereto.

Respectfully submitted,

NATHANIEL R. MENDELL  
Acting United States Attorney

By: /s/ Sarah B. Hoefle  
Michael J. Crowley  
Sarah B. Hoefle  
Assistant U.S. Attorneys

Date: December 10, 2021

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA                         )  
                                                            )  
v.                                                      )                                                              Criminal No. 18-10197-LTS-8  
                                                            )  
RICKY PINA, a/k/a "Blake,"                      )  
                                                            )  
Defendant.                                            )

**ORDER COMPELLING PRODUCTION OF STATE PROBATION  
DOCUMENTS AND TESTIMONY REGARDING GPS DATA**

This matter is before the Court on a motion by the United States for an Order requiring the production of records maintained by the Commonwealth of Massachusetts, Massachusetts Probation Service and testimony related to GPS records for defendant Ricky Pina for the time period of September 5, 2017. The requested records are sought by the United States to be used in the preparation for and trial of the defendant Ricky Pina in the above-referenced case.

The Court hereby grants the United States' motion, and orders that the requested documents be produced to the United States pursuant to this Order. These records may be introduced into evidence at trial in the above-referenced case and may be used in the preparation of witnesses for trial in the above-referenced case. A copy of this Order may be served on the Commonwealth of Massachusetts.

SO ORDERED.

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HONORABLE LEO T. SOROKIN  
United States District Judge

Date: \_\_\_\_\_